

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
GREENWOOD DIVISION**

George H. Greenwood, Jr., and Tene  
Greenwood,

Plaintiffs,

v.

West Fraser, Inc.,

Defendant.

Case No.:

**NOTICE OF REMOVAL**

**TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA, GREENWOOD DIVISION; THE COURT OF COMMON PLEAS FOR NEWBERRY COUNTY; AND ALL COUNSEL OF RECORD:**

West Fraser, Inc. (“Defendant”), by and through its undersigned counsel, hereby files this Notice of Removal into the United States District Court for the District of South Carolina, Greenwood Division, from the Court of Common Pleas for Newberry County, South Carolina. This removal is proper on the following grounds:

1. This action was brought in the Court of Common Pleas, County of Newberry, State of South Carolina, by George H. Greenwood, Jr., and Tene Greenwood (“Plaintiffs”), with the filing of a Summons and Complaint on January 3, 2022. State Court pleadings are attached hereto as Exhibit “A.”

2. The Summons and Complaint were served on CT Corporation as Registered Agent for Defendant on or about January 14, 2022. A copy of the Proof of Service is attached hereto as Exhibit “B.”

3. This action arises out of an alleged injury occurring on Defendant’s property that occurred on or about September 21, 2020. All of the events and omissions complained of in the Complaint occurred in Newberry County, South Carolina.

4. This Notice of Removal is based on diversity of citizenship pursuant to 28 U.S.C. § 1332 and is filed within 30 days of service upon Defendant.

5. Defendant is a corporation organized and existing in the State of Delaware with its principal place of business in Germantown, Tennessee.

6. Based upon Plaintiffs' allegations, Plaintiffs are citizens of the State of South Carolina.

7. Based on a fair reading of the substantive allegations, the amount of controversy being sought by Plaintiffs could exceed \$75,000.00, exclusive of interest and costs.

8. A copy of this Notice of Removal will be filed with the Clerk of Court for the Newberry County Court of Common Pleas.

9. Defendant specifically reserves, and expressly does not waive, any defenses it may have.

10. Defendant has simultaneously served herewith its Answers to Local Rule 26.01 Interrogatories.

11. Defendant simultaneously files its Answer to Plaintiff's Complaint in accordance with all applicable *Federal Rules of Civil Procedure*.

WHEREFORE, the Defendant hereby gives notice that the aforesaid action is removed from the Court of Common Pleas for Newberry County, South Carolina, into this Court for trial and determination.

***/SIGNATURE ON FOLLOWING PAGE/***

Respectfully submitted,

s/Bradish J. Waring

Bradish J. Waring (Fed ID #4523)

Kenyatta L. Gardner (Fed ID #11238)

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February 12, 2022  
Charleston, SC

*Attorneys for Defendant*